

LIPSON NEILSON P.C.
JOSEPH P. GARIN, ESQ.
Nevada Bar No. 6653
9900 Covington Cross Drive, Suite 120
Las Vegas, Nevada 89144
Phone: (702) 382-1500
Fax: (702) 382-1512
jgarin@lipsonneilson.com

Attorneys for Defendant Comenity Capital Bank N.A.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LOUIS SELIGMAN,

Plaintiff,

vs.

EQUIFAX INFORMATION SERVICES,
LLC; EXPERIAN INFORMATION
SOLUTIONS, INC.; SYNCHRONY
FINANCIAL; and COMENITY CAPITAL
BANK,

Defendants.

Case No: 2:23-cv-01410-JCM-VCF

**JOINT UNOPPOSED MOTION TO
EXTEND DEADLINE FOR
DEFENDANT COMENITY CAPITAL
BANK TO RESPOND TO
COMPLAINT**

[FIRST REQUEST]

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A) and Local Rule IA 6-1, Defendant Comenity Capital Bank ("Comenity") and Plaintiff Louis Seligman ("Plaintiff"), by and through their respective counsel, request that the Court grant their Joint Unopposed Motion to Extend the Time for Comenity to answer or otherwise respond to Plaintiff's Complaint. In support of this Motion, the parties stipulate as follows:

1. The Complaint was served on Comenity on September 14, 2023.
2. Comenity's current deadline to respond to the Complaint is October 5, 2023.
3. Comenity hired new counsel, Joe Garin of Lipson Neilson, on September 20, 2023.
4. The parties met and conferred about the extension of time to respond to the Complaint and agreed that Comenity's deadline to respond to the Complaint shall be extended to November 6, 2023.

1 5. There have been no prior extensions of Comenity's deadline to respond to
2 the Complaint.

3 6. Accordingly, the parties respectfully and jointly request that the Court
4 extend the deadline for Comenity to answer or otherwise respond to the Complaint to
5 November 6, 2023.

6 DATED: September 28, 2023

LIPSON NEILSON P.C.

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8 By: 

Joseph P. Garin, Esq.
Nevada Bar No. 6653
9900 Covington Cross Dr.
Suite 120
Las Vegas, NV 89144

*Attorneys for Defendant
Comenity Capital Bank*

14 DATED: September 28, 2023

FREEDOM LAW FIRM, LLC

16 By: /s/ Gerardo Avalos

Gerardo Avalos, Esq.
Nevada Bar No. 15171
8985 South Eastern Avenue,
Suite 100
Las Vegas, NV 89123

Attorney for Plaintiff Louis Seligman

22 **ORDER**

23 IT IS SO ORDERED.

24 
25 United States Magistrate Judge
Dated: _____

26 9-29-2023